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Page 1
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                     UNITED STATES DISTRICT COURT
                     SOUTHERN DISTRICT OF NEW YORK
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                         CASE NO.: 20-cv-3699
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     PDV USA, INC.,
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          Plaintiff,
 6
      -vs-
 7
     INTERAMERICAN CONSULTING INC.,
 8
          Defendant.
 9
10
          DEPOSITION OF: HUGO PERERA
11
          DATE:
                           Tuesday, March 8, 2022
12
                           9:30 a.m. - 12:03 p.m.
          TIME:
13
          PLACE:
                           ALEXANDER F. FOX P.A
14
                           1 Alhambra Plaza
                           Suite 1225
15
                           Coral Gables, Florida 33134
16
17
          STENOGRAPHICALLY
          REPORTED BY: VANESSA OBAS, RPR
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Page 38 Page 40 MR. JOHNSON: Object to the form. 1 the CEO of ExxonMobil? 1 2 THE WITNESS: Based on the advice of counsel, I 2 A. Based on the advice of counsel, I invoke my 3 invoke my Fifth. 3 Fifth. 4 BY MR. SULLIVAN: 4 Q. Are you aware of any communications between Q. And isn't it also true that these cover stories 5 David Rivera and Darren Woods in connection with the were designed to conceal a money laundering scheme consulting services agreement? 7 involving Mr. Rivera, Mr. Gorrin, Ms. Nuhfer, and A. Based on the advice of counsel, I invoke my yourself; isn't that right? 8 Fifth. 9 MR. JOHNSON: Objection to form. 9 Q. And as far as you're aware, no such 10 THE WITNESS: Based on the advice of counsel, I 10 communications ever occurred; right? 11 invoke my Fifth. 11 A. Based on the advice of counsel, I invoke my 12 MR. JOHNSON: One moment, Mr. Perera. If you 12 Fifth. 13 hear me starting to object, just allow me to please 13 Q. Did you ever communicate with former United 14 say it --14 States Congressman Sam Johnson? 15 THE WITNESS: Oh, I'm sorry. 15 A. Based on the advice of counsel, I invoke my 16 MR. JOHNSON: -- for the record before you 16 Fifth. 17 respond. 17 Q. Are you aware of any communications between 18 THE WITNESS: Okay. I'm sorry. 18 David Rivera and Sam Johnson in connection with the 19 MR. JOHNSON: I'm objecting to the form of that 19 consulting agreement? 20 question. Thank you. 20 A. Based on the advice of counsel, I invoke my 21 BY MR. SULLIVAN: 21 Fifth. Q. I think I need to ask it again just because the 22 22 Q. Again, as far as you're aware, no such 23 record --23 communications ever occurred; right? 24 So allow Mr. Jason -- Mr. Johnson time to 24 A. Based on the advice of counsel, I invoke my 25 object. 25 Fifth. Page 39 Page 41 And isn't it true that these cover stories by MR. JOHNSON: I'm going to object to the form 1 1 2 Mr. Rivera here in this document were designed to 2 of that question. 3 BY MR. SULLIVAN: conceal a money laundering scheme involving Mr. Rivera, Mr. Gorrin, Ms. Nuhfer, and yourself; isn't that right? Q. Have you ever communicated with Venezuelan MR. JOHNSON: Object to the form. politician Henry Ramos Allup, A-L-L-U-P? 5 THE WITNESS: Based on the advice of counsel, I A. Based on the advice of counsel, I invoke my 6 6 7 Fifth. 7 invoke my Fifth. 8 8 BY MR. SULLIVAN: Q. Do you know who that is? 9 Q. I have a few more questions about the A. Based on the advice of counsel, I invoke my 10 Fifth. 10 consulting agreement, which, again, begins on PGA 0055. Q. Are you aware of any communications between 11 And my first question is, have you ever communicated 11 12 with a person named Randy Ebner, former general counsel 12 David Rivera and Henry Ramos Allup in connection with 13 for ExxonMobil? 13 the consulting agreement? A. Based on the advice of counsel, I invoke my 14 A. Based on the advice of counsel, I invoke my 14 15 Fifth. 15 Fifth. 16 Q. Are you aware of any communications between 16 Q. And as far as you're aware, no such 17 David Rivera and Randy Ebner in connection with the 17 communications ever occurred; right? 18 consulting agreement? 18 MR. JOHNSON: Objection. 19 A. Based on the advice of counsel, I invoke my 19 THE WITNESS: Based on the advice of --20 Fifth. 20 MR. JOHNSON: Object to the form. 21 Q. And as far as you're aware, no such 21 THE WITNESS: Based on the advice of counsel, I 22 communications ever occurred; right? 22 invoke my Fifth. 23 A. Based on the advice of counsel, I invoke my 23 BY MR. SULLIVAN: 24 Fifth. 24 Q. Have you ever communicated with Venezuelan 25 25 politician Oliver Blanco? Q. Have you ever communicated with Darren Woods,

| 1 A. Based on the advice of counsel, I invoke my 2 Fifth. 3 Q. Do you know who that is? 4 A. Based on the advice of counsel, I invoke my 5 Fifth. 6 Q. Are you aware of any communications between 7 David Rivera and Oliver Blanco in connection with the 8 consulting agreement? 9 A. Based on the advice of counsel, I invoke my 10 Fifth. 11 Q. As far as you're aware, no such communications 12 ever occurred; right? 13 MR, JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 15 invoke my Fifth. 16 BY MR, SULLIVAN: 17 Q. Again, focusing on the consulting agreement bero on Eshibit I, beginning on page PGA 0035, my 18 question, sir, is, are you aware of any money laundering to connection with this contract? 19 A. Based on the advice of counsel, I invoke my 19 question, sir, is, are you aware of any money laundering to connection with this contract? 21 A. Based on the advice of counsel, I invoke my 22 Fifth. 23 Q. Do you know whose money was being laundered in 24 connection with this contract? 24 A. Based on the advice of counsel, I invoke my 25 Fifth. 26 MR, JOHNSON: Object to the form. 27 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 28 MR, JOHNSON: Object to the form. 29 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 30 Q. Do you know whose money was being laundered in 24 connection with this contract? 31 Q. Do you know whose money was being used to bribe government officials? 32 Q. Do you know whose money was being used to bribe government officials in connection with this contract? 33 Q. Do you know whose money was being used to bribe government officials in connection with this contract? 34 A. Based on the advice of counsel, I invoke my Fifth. 35 Q. Were you involved in money laundering in connection with this contract? 36 Q. Do you know who else was involved in orchestrating bribes to government officials in orchector to the form. 36 Q. Davin know who else was involved in orchestrating bribes to government officials in orncection with this contract? 36 Q. | | Page 42 | | Page 44 |
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| 2 Pith. 3 Q. Do you know who that is? 4 A. Based on the advice of counsel, I invoke my pith. 5 Fifth. 6 Q. Are you aware of any communications between David Rivera and Oliver Blance in connection with the consulting agreement? 7 David Rivera and Oliver Blance in connection with the consulting agreement? 8 A. Based on the advice of counsel, I invoke my pith. 10 Q. As far as you're aware, no such communications 12 ever occurred: right? 11 Q. As far as you're aware, no such communications 12 ever occurred: right? 12 MR. JOHNSON: Object to the form. 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 15 invoke my Fifth. 16 BY MR. SULLIVAN: 17 Q. Again. focusing on the consulting agreement 18 here on Exhibit 1, beginning on page PGA 0055, my question, sir, is, are you aware of any money laundering 19 question, sir, is, are you aware of any money laundering 10 that occurred in connection with this contract? 18 MR. JOHNSON: Object to the form. 29 Fifth. 20 Q. Do you know whose money was being laundered in connection with this consulting agreement? 21 A. Based on the advice of counsel, I invoke my Fifth. 22 MR. FERRO: Object to the form. 23 Invoke my Fifth. 24 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 25 MR. JOHNSON: Object to the form. 26 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 27 MR. JOHNSON: Object to the form. 28 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 3 MR. FERRO: Object to the form. 4 MR. JOHNSON: Object to the form. 5 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 5 MR. FERRO: Object to the form. 6 Connection with this contract? 7 MR. JOHNSON: Object to the form. 7 MR. JOHNSON: Object to the form. 8 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 9 MR. SULLIVAN: 10 Q. Do you know who else was involved in money laundering in connection with this contract? 11 A. Based on the advice of counsel, I invoke my Fifth. 12 MR. FERRO: Object to the form. 13 MR. FERRO: Obj | 1 | • | 1 | |
| 3 Q. Do you know who that is? 4 A. Based on the advice of counsel, I invoke my Fifth. 5 Q. Are you aware of any communications between bound fixer and Oliver Blanco in connection with the consulting agreement? 9 A. Based on the advice of counsel, I invoke my Fifth. 10 Q. As far as you're aware, no such communications level and provided in money laundering in connection with this consulting agreement? 14 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 15 invoke my Fifth. 16 BY MR. SULLIVAN: 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement here on Exhibit I, beginning on page PGA 0055, my question, sir, is, are you aware of any money laundering a connection with this consulting agreement? 19 A. Based on the advice of counsel, I invoke my Fifth. 10 BY MR. SULLIVAN: 21 Connection with this consulting agreement? 22 Fifth. 23 Q. Do you know whose money was being laundered in connection with this consulting agreement? 24 A. Based on the advice of counsel, I invoke my Fifth. 25 MR. JOHNSON: Object to the form. 26 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 27 MR. JOHNSON: Object to the form. 28 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 3 MR. JOHNSON: Object to the form. 4 BY MR. SULLIVAN: 4 BY MR. SULLIVAN: 5 Q. Were you involved in money laundering in connection with this consulting agreement? 4 MR. JOHNSON: Object to the form. 5 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 6 DA WR. JOHNSON: Object to the form. 7 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 8 BY MR. SULLIVAN: 9 Da you know who else was involved in money laundering in connection with this consulting agreement? 19 Invoke my Fifth. 10 BY MR. SULLIVAN: 10 Linvoke my Fifth. 11 Linvoke my Fifth. 12 Connection with this contract? 12 Connection with this contract? 13 Invoke my Fifth. 14 Day Invoke my Fifth. 15 Invoke my Fifth. 15 Invoke my Fifth. 16 BY MR. SULLIVAN: 17 Connection with this contract? 18 MR. JOHNSON: Object to the form. 19 THE WI | | • | | |
| 4 A. Based on the advice of counsel, I invoke my 5 Fifth. 5 By MR. SULLIVAN: 9 A. Based on the advice of counsel, I invoke my 16 Fifth. 17 Q. As far as you're aware, no such communications 18 ever occurred; right? 18 MR. JOHNSON: Object to the form. 19 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 10 Invoke my Fifth. 10 BY MR. SULLIVAN: 11 Invoke my Fifth. 12 Page 43 1 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I invoke my 15 invoke my Fifth. 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement invoke my Fifth. 18 here on Exhibit 1, beginning on page PGA 0055, my 19 question, sir, is, are you aware of any money laundering in that occurred in connection with this contact? 19 MR. JOHNSON: Object to the form. 20 A. Based on the advice of counsel, I invoke my 21 Fifth. 22 MR. JOHNSON: Object to the form. 23 Q. Do you know whose money was being laundered in incention with this consulting agreement? 24 MR. JOHNSON: Object to the form. 25 MR. JOHNSON: Object to the form. 26 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 27 MR. JOHNSON: Object to the form. 28 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 29 MR. SULLIVAN: 30 Q. Do you know whose money was being laundered in incention with this contract? 31 MR. JOHNSON: Object to the form. 32 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 33 MR. FERRO: Object to the form. 44 MR. JOHNSON: Object to the form. 45 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 46 MR. JOHNSON: Object to the form. 47 MR. JOHNSON: Object to the form. 48 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 49 YMR. SULLIVAN: 40 Q. Doy u know whose money was being used to bribe government officials in connection with this contract? 41 MR. JOHNSON: Object to the form. 42 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 43 Doy us know whose money was being used to bribe government officials in conn | 3 | | | |
| 5 Fifth. 6 Q. Are you aware of any communications between 7 David Rivera and Oliver Blanco in connection with the 8 consulting agreement? 9 A. Based on the advice of counsel, I invoke my 10 Fifth. 11 Q. As far as you're aware, no such communications 12 ever occurred: right? 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 15 invoke my Fifth. 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement 18 here on Exhibit I, beginning on page PGA 0055, my 19 question, sir, is, are you aware of any money laundering 10 that occurred in connection with this contract? 11 A. Based on the advice of counsel, I invoke my Fifth. 12 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 13 MR. JOHNSON: Object to the form. 14 Connection with this consulting agreement? 15 MR. JOHNSON: Object to the form. 16 MR. JOHNSON: Object to the form. 17 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 18 WR. SULLIVAN: 19 MR. FERRO: Object to the form. 20 MR. JOHNSON: Object to the form. 21 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 22 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 23 MR. JOHNSON: Object to the form. 24 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 25 WR. SULLIVAN: 26 Q. Were you involved in money laundering in connection with the consulting agreement? 27 MR. JOHNSON: Object to the form. 28 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 39 MR. FERRO: Object to the form. 40 MR. JOHNSON: Object to the form. 41 MR. JOHNSON: Object to the form. 42 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 43 BY MR. SULLIVAN: 44 MR. JOHNSON: Object to the form. 45 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 46 Day ow know who else was involved in money laundering in connection with this contract? 47 MR. JOHNSON: Object to the form. 48 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 49 WR. SULLIVAN: 50 Q. Vere you involved in money laundering in | 4 | | 4 | |
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| 7 participated in money laundering in connection with this consulting agreement? 8 consulting agreement? 9 A. Based on the advice of counsel, I invoke my Fifth. 10 Q. As far as you're aware, no such communications 2 ever occurred; right? 11 Q. As far as you're aware, no such communications 2 ever occurred; right? 12 WITNESS: Based on the advice of counsel, I 1 invoke my Fifth. 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 1 invoke my Fifth. 16 BY MR. SULLIVAN: 16 MR. JOHNSON: Object to the form. 17 Q. Again, focusing on the consulting agreement 17 participated in money laundering and the counsel in invoke my Fifth. 18 MR. FERRO: Object to the form. 19 G. Do you know whose money was being laundered in 2 invoke my Fifth. 19 MR. FERRO: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. FERRO: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. FERRO: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 2 THE WITNESS: Based on the advice of counsel, I invoke my Fifth. 19 MR. JOHNSON: Object to the form. 2 MR. JOHNSON: Object to the form. 3 MR. JO | 6 | Q. Are you aware of any communications between | 6 | |
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| A. Based on the advice of counsel, I invoke my 10 Fifth. 11 Q. As far as you're aware, no such communications 12 ever occurred; right? 12 BY MR. JOHNSON: Object to the form. 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 11 invoke my Fifth. 16 BY MR. SULLIVAN: 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement 18 here on Exhibit I, beginning on page PGA 0055, my 19 question, sir, is, are you aware of any money laundering 19 dual toccurred in connection with this contract? 19 BY MR. SULLIVAN: 19 BY MR. SULLIVAN: 19 BY MR. SULLIVAN: 19 BY MR. SULLIVAN: 19 and the advice of counsel, I invoke my Fifth. 19 and the advice of counsel, I invoke my Fifth. 19 and the advice of counsel, I invoke my Fifth. 19 and the advice of counsel, I 10 and the | 8 | | 8 | |
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| 12 EVER OCCURRED, Fight? 13 MR. JOHNSON: Object to the form. 14 THE WITNESS: Based on the advice of counsel, I 15 invoke my Fifth. 16 BY MR. SULLIVAN: 16 BY MR. SULLIVAN: 17 Q. Again, focusing on the consulting agreement 18 here on Exhibit I, beginning on page PGA 0055, my 19 question, sir, is, are you aware of any money laundering 16 that occurred in connection with this contract? 18 EFRO: Object to the form. 19 University of the consulting agreement 19 University of the form. 19 University of the consulting agreement 19 University of the consulting agr | 11 | O. As far as you're aware, no such communications | 11 | • |
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